

**FILED**

3:51 pm Sep 01 2020  
 Clerk U.S. District Court  
 Northern District of Ohio  
 Cleveland

**IN THE UNITED STATES DISTRICT  
 FOR THE NORTHERN DISTRICT OF OHIO  
 EASTERN DIVISION**

<b>MICHELLE ROSE</b>	:	<b>CASE NO. 1:20-CV-00132</b>
	:	
<b>Plaintiff</b>	:	
	:	<b>JUDGE: JAMES S. GWIN</b>
<b>v.</b>	:	
	:	
<b>UNIVERSITY HOSPITALS</b>	:	
<b>PHYSICIAN SERVICES, INC.</b>	:	
	:	
<b>Defendant</b>	:	

Plaintiff's first request for discovery from the defendant.

1. A copy of all my employee evaluations from 2005 through 2017. These should be part of my employee file with Human Resources Department.
2. A copy of all the letters from HR and or my direct supervisors informing me of my annual pay raise amount from 2005 through 2017. Or a copy of each paycheck stub each year reflecting my pay raise each year from 2005 through 2017.
3. Contact information for Cynthia (Cindy) Clark in order to subpoena her to appear in court for questioning.
4. A copy of University Hospitals policy and procedures for termination standards and steps.
5. A copy of an email from myself, addressed to Cindy Clark requesting information for a dictation service that we are allowed to use for UHPS. A copy of Cindy's reply to that email, telling me to look in the Oracle system under approved vendors. This email exchange would have been done in July of 2017.
6. A copy of an email from Valerie Jaggie in Human Resources to Cindy Clark asking her to "find out why there is no overtime on my time card this pay period".
7. A copy of an email from Cindy Clark to Michelle Rose asking about the overtime on my time card per HR.

8. A copy of an email from Michelle Rose responding to Cindy Clark on why there is no overtime on my time card.
9. A copy of the email dated December 12, 2017 and December 14, 2017 where I was accused of "sending serveral unprofessional emails to her manager, staff and a co-worker in another department" Please send the emails dated December 12, 2017 and December 14, 2017 that were unprofessional.
10. A copy of the email from HR Valerie Jaggie to all UHPS Managers and or Practice Leads regarding the new arrangement for time cards. This email would have been sent in late October 2017.

Please provide the following information to me via email at [Mellis4702@aol.com](mailto:Mellis4702@aol.com) as PDF attachments. Please provide this information to me no later than September 15, 2020.

Thank you,

A handwritten signature in black ink that reads "Michelle Rose". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Michelle Rose